



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 18, 2016

Jean Claude Marcelin
Manager, Regulatory Affairs EPA Services
Professional Disposables International, Inc.
100 Philips Parkway
Montvale, NJ 07645

Subject: Notification per PRN 98-10 – Alternative brand name and change “ml” to “mL”
on page one
Product Name: Backspray RTU
EPA Registration Number: 9480-11
Application Date: March 11, 2016
Decision Number: 514926

Dear Jean Claude:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Antimicrobials Division (AD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

The alternate brand name Sani Professional No-Rinse Sanitizing Multi-Surface Spray has been added to the product record.

If you have any questions, you may contact Joe Daniels at (703) 347-8669 or via email at daniels.joseph@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "E. Miederhoff". The signature is written in a cursive style with a large, stylized initial "E".

Eric Miederhoff
Product Manager 31
Regulatory Management Branch I
Antimicrobials Division (7510P)
Office of Pesticide Programs

NOTIFICATION

9480-11

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

04/18/2016

[Front Panel]

BACKSPRAY RTU

[Alternate brand name: Sani Professional® No-Rinse Sanitizing Multi-Surface Spray]

ACTIVE INGREDIENTS:

Didecyl dimethyl ammonium chloride.....	0.023%
Alkyl (50% C ₁₄ , 40% C ₁₂ , 10% C ₁₆) dimethyl benzyl ammonium chloride.....	0.015%
<u>OTHER INGREDIENTS</u>	<u>99.962%</u>
TOTAL	100.000%

KEEP OUT OF REACH OF CHILDREN

NET CONTENTS _____ fl. oz [or qt.] [(mL or l)]

[Any Panel]

EPA Reg. No.: 9480-11

EPA Est. No. : 9480-NY-1 or [EPA Est. No. A=9480-NY-1, C=72956-AR-1 (or others)]

Alpha character will precede batch code on product

[Manufactured by [or for]]:

Professional Disposables International, Inc.

Two Nice-Pak Park, Orangeburg, NY 10962-1376 [USA]

[For information call: *[phone number to be inserted]*]

[Made in [USA] [with domestic and imported materials] *[insert country]*]

[Note to Reviewer: According to EPA's Label Review Manual, Precautionary Statements and First Aid are not required for the registrant to include when the product is classified as Category IV for acute toxicity]

THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol "*" is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included

Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

TO SANITIZE [HARD NON POROUS FOOD-CONTACT SURFACES]:

[For Lightly Soiled Surfaces: Pre-clean surface by spraying [*product name or this product*] until wet and wipe clean. To sanitize, spray [*product name or this product*] 6-8 inches from surface until thoroughly wet. Allow treated surface to remain wet for one minute [*or 60 seconds*]. No rinsing required.]

[For Heavily Soiled Surfaces:] Remove all food particles and soil from surfaces that are to be sanitized by thoroughly washing the surfaces with a detergent, followed by a potable water rinse before applying [this sanitizing spray] [*or product name*] [*or this product*]. Spray [*product name or this product*] 6-8 inches from surface until thoroughly wet. Allow treated surface to remain wet for one minute [*or 60 seconds*]. No rinsing required.

99.999% effective in one minute [*or 60 seconds*] against *Escherichia coli* [(ATCC # 11229)], *Staphylococcus aureus* [(ATCC #6538)], *Salmonella enterica* [(ATCC #10708)], *Shigella boydii* [(ATCC #9207)], *Campylobacter jejuni* [(ATCC #29428)], *Vibrio parahaemolyticus* [(ATCC #17802)], Methicillin-Resistant *Staphylococcus aureus* (MRSA) [(ATCC #33592)], *Klebsiella pneumoniae* [(ATCC #4352)], *Escherichia coli* O157:H7 [(ATCC #35150)], and *Listeria monocytogenes* [(ATCC #19117)].

Items may include: [*Use one or more of the following:*]

[Airline tray tables]	[Fridges]	[Reach-in refrigeration and freezer units]
[Airplane tray tables]	[High chair trays]	[Refrigerators]
[Appliances]	[Hospital meal trays]	[Restaurant tables]
[Backsplashes]	[Laminated menus]	[Scales]
[Bar tops]	[Lunch boxes]	[Self-service condiment areas]
[Cafeteria trays]	[Microwaves]	[Self-service service ware areas]
[Checkout lanes]	[Mixers]	[Slicers]
[Condiment containers]	[Non wood cutting boards]	[Tables]
[Conveyer belts]	[Nozzles]	[Take out counters]
[Counter tops]	[Pill counters]	[Waitress stations]
[Dining tables]	[Pill trays]	[Walk-in refrigeration and freezer units]
[Dish racks]	[Probe portion of meat thermometers]	[Work tables]
[Food carts]	[Probe portion of food thermometers]	
[Food preparation tables]	[Ranges]	
[Food [manufacturing] [processing] [equipment][[parts]]]	[Range tops and hoods]	
[Food trays]		

[*The following uses must be preceded by the words:*" [outside surface[s] of]" or "[exterior surface[s] of]" :]

[Beverage dispensers]	[Food mixers]	[Pulpers]
[Broilers]	[Griddles]	[Ovens]
[Chargrills]	[Grills]	[Steam tables]
[Cooking surfaces]	[Ice machines]	[Toasters]

[*Add the following after the list of surfaces:*] and other similar hard, nonporous food contact surfaces.

THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol "*" is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included

Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016

[TO SANITIZE] [HARD NON POROUS NONFOOD-CONTACT SURFACES]:

[Cleaning and] Sanitizing Procedure:

For Lightly Soiled Surfaces: Spray [*product name*] [*or this product*] 6-8 inches from surface until thoroughly wet. Allow treated surface to remain wet for one minute [*or 60 seconds*]. No rinsing required.

For Heavily Soiled Surfaces: Remove all food particles and soil from surfaces that are to be sanitized by thoroughly washing the surfaces with a detergent, followed by a potable water rinse before applying this [sanitizing spray] [*product name*] [*or this product*]. Spray [*product name*] [*or this product*] 6-8 inches from surface until thoroughly wet. Allow treated surface to remain wet for one minute [*or 60 seconds*]. No rinsing required.

Use on one or more of the following:

[Bath tubs]	[Garbage cans]	[Restaurant chairs]	[Tiled walls]
[Booster seats]	[Hampers]	[Shopping carts	[Toilet seats [and/or]
[Cash registers]	[Hotel room [surfaces]	[and/or] [baskets]]	rims]
[Chairs]	[and/or] [counters]]	[Showers]	[Towel dispensers]
[Cribs]	[Infant-changing	[Sinks]	[Trashcans]
[Diaper pails]	tables]	[Stall doors]	[Vanities]
[Display cabinets]	[Infant high chairs]	[[Store] check-out	
[Doorknobs]	[Faucets]	areas]	
[Drain boards]	[Floors]	[Strollers]	
[Employee areas]	[Railings]	[Telephones]	

99.9% effective in one minute [*or 60 seconds*] against *Staphylococcus aureus* [(ATCC #6538)] and *Enterobacter aerogenes* [(ATCC # 13048)].

[CLEANING AND DEODORIZING

Spray surface until wet, wipe surface with dry towel until clean. Let air dry.]

STORAGE AND DISPOSAL

Storage: Do not store near heat or open flame. Use product only from original container.

For a non-refillable container

Spray Bottle [or Container] [or Jug] Disposal: Do not reuse or refill this container. Offer for recycling. If recycling is not available, put in trash collection.

Or, if refillable dispenser is being used, substitute the following:

Refill Bottle [or Container] [or Jug] Disposal: Rinse cracked or broken containers and offer for recycling. If recycling is not available, discard in trash.

PRECAUTIONARY STATEMENTS

Physical or chemical hazard

Combustible. Do not use or store near heat or open flame.

THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol "**" is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included
Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016

[Use at least one of the use sites indicated in the paragraph below or in the "For Use In" section below:]

[AREAS OF USE IN FOOD SERVICE AND FOOD PREPARATION:]

This product is recommended for use in retail food establishments [including:] [restaurants,] [hotels,] [kitchens,] [airplanes,] [food service in healthcare settings,] [delicatessens,] [supermarkets,] [temporary food establishments,] [food processing plants,] and other food service and food preparation settings where the [control of the hazards] [prevention] of cross-contamination between treated surfaces is of primary importance.

[FOR USE IN:]

[Airplanes]	[Food Service Facilities]	[Nutraceutical Production Facilities]
[Athletic Facilities]	[Food Trucks]	[Pharmaceutical Production Facilities]
[Banquet Halls]	[Funeral Homes] [Mortuaries]	[Pharmacy]
[Beverage Processing Facilities]	[Grocery]	[[Poultry][Meat/Seafood Packing] Facilities]
[Cafeterias]	[Gyms]	[Restaurants]
[Cars]	[Healthcare Food Service]	[Schools]
[Caterers]	[Health Clubs]	[Shopping Centers]
[Catering Facilities]	[Home] [Residences]	[Temporary Food Establishments]
[Correctional Facilities]	[Households]	[Transportation Centers]
[Cruise Ships]	[Household kitchens [and/or] bathrooms]]	
[Day Care Settings]	[Hotels]	
[Delicatessens]	[In-Store Demos]	
[Dining halls]	[Kitchens]	
[Drug Stores]	[Mobil Food Establishments]	
[Fitness Centers]	[Motels]	
[Food Manufacturing Facilities]	[Nurseries]	
[Food Packaging Facilities]	[Nursing Homes]	
[Food Processing Facilities]		

[For use on the following[:] [types of surfaces:]]

[Aluminum]
[Chrome]
[Corian®]
[Finished Wood]
[Finished Polyurethane]
[Formica®]
[Glazed Porcelain (Surfaces)]
[Glazed Porcelain (Enamel)(Kitchen)(Tile)]
[Laminated Surfaces (Laminate)]
[Laminated Wood]
[Metal]
[Polystyrene]
[Quartz]
[Sealed Cement]
[Sealed Granite]
[Sealed Synthetic Marble]
[Steel Surfaces]
[Sealed Stone Surfaces]
[Stainless Steel]

THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol "*" is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included

Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016

[All below are optional/ label (placement optional) literature and promotional statements]

*99.999% effective in 60 seconds against *Escherichia coli* [(ATCC #11229)], *Staphylococcus aureus* [(ATCC #6538)], *Salmonella enterica* [(ATCC #10708)], *Shigella boydii* [(ATCC #9027)], *Campylobacter jejuni* [(ATCC #29428)], *Vibrio parahaemolyticus* [(ATCC #17802)], Methicillin-Resistant *Staphylococcus aureus* (MRSA) [(ATCC #33592)], *Klebsiella pneumoniae* [(ATCC #4352)], *Escherichia coli* O157:H7 [(ATCC #35150)], and *Listeria monocytogenes* [(ATCC #19117)] on hard, nonporous food contact surfaces.

Aids in the reduction of cross-contamination between treated surfaces**

All applicable health inspection agency code requirements must be followed for cleaning, rinsing and sanitizing.

Always follow directions for use on this [or the] label.

Antibacterial

Antimicrobial

Bleach free [this is included as useful info for users needing a bleach-free product]

By Grime Boss®

Cleans, deodorizes and kills common foodservice/foodborne bacteria

Cleans, deodorizes and kills common household bacteria

Commercial use

Designed to clean, then sanitize lightly soiled, hard, nonporous food contact surfaces [where the control of cross-contamination between treated surfaces is of primary importance]

Do not use on natural marble, windows, unpainted wood, brass, clear plastic or colored grout.

Easy to use

Effective in sanitizing around the [house][office][bathroom][kitchen]

Eliminates odors

Everyday use

Fast drying formulation

Food Code Compliant (referencing 2013 Food Code)

Food Contact Surface** Sanitizer

For Food processing [commercial] [industrial] use

For a total cleaning and sanitizing solution

For [heavy] [or light] duty jobs

For hard non-porous household surfaces

For use in retail and institutional food establishments, food processing plants and other health department regulated food facilities**.

For use on hard nonporous surfaces in [professional] [commercial] kitchens

Incorporate as part of your [pathogen reduction] [or food safety] [or infection prevention] [or foodborne illness protection] program

Ideal for daily use

Industrial use [only for use in products labeled for commercial uses]

Helps prevent cross-contamination by killing bacteria on hard nonporous surfaces

[Its] [Product name's] quat-based formula is [EPA] registered and proven effective against foodborne pathogens listed below* *99.999% effective in 60 seconds against *Escherichia coli* [(ATCC #11229)], *Staphylococcus aureus* [(ATCC #6538)], *Salmonella enterica* [(ATCC #10708)], *Shigella boydii* [(ATCC #9207)], *Campylobacter jejuni* [(ATCC #29428)], *Vibrio parahaemolyticus* [(ATCC #17802)], Methicillin-Resistant *Staphylococcus aureus* (MRSA) [(ATCC #33592)], *Klebsiella pneumoniae* [(ATCC #4352)], *Escherichia coli* O157:H7 [(ATCC #35150)], and *Listeria monocytogenes* [(ATCC #19117)]

Kills 99.9% of *Staphylococcus aureus* [(ATCC #6538)] and *Enterobacter aerogenes* [(ATCC # 13048)] in 60 seconds

Kills 99.999% of *Escherichia coli* [(ATCC #11229)], *Staphylococcus aureus* [(ATCC #6538)], *Salmonella enterica* [(ATCC #10708)], *Shigella boydii* [(ATCC #9207)], *Campylobacter jejuni* [(ATCC #29428)], *Vibrio parahaemolyticus* [(ATCC #17802)], Methicillin-Resistant *Staphylococcus aureus* (MRSA) [(ATCC #33592)], *Klebsiella pneumoniae* [(ATCC #4352)], *Escherichia coli* O157:H7 [(ATCC #35150)], and *Listeria monocytogenes* [(ATCC #19117)] in 60 seconds on [cleaned] [and rinsed] hard, nonporous food contact surfaces

THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol "**" is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included

Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016

Kills [99.9% of] common household bacteria

Kills common household bacteria including: *Escherichia coli* [(ATCC #11229)], *Staphylococcus aureus* [(ATCC #6538)], *Salmonella enterica* [(ATCC #10708)], *Shigella boydii* [(ATCC #9207)], *Campylobacter jejuni* [(ATCC #29428)], *Vibrio parahaemolyticus* [(ATCC #17802)], Methicillin-Resistant *Staphylococcus aureus* (MRSA) [(ATCC #33592)], *Klebsiella pneumoniae* [(ATCC #4352)], *Escherichia coli* O157:H7 [(ATCC #35150)], and *Listeria monocytogenes* [(ATCC #19117)]

Kills common foodborne pathogens including: *Escherichia coli* [(ATCC #11229)], *Staphylococcus aureus* [(ATCC #6538)], *Salmonella enterica* [(ATCC #10708)], *Shigella boydii* [(ATCC #9207)], *Campylobacter jejuni* [(ATCC #29428)], *Vibrio parahaemolyticus* [(ATCC #17802)], Methicillin-Resistant *Staphylococcus aureus* (MRSA) [(ATCC #33592)], *Klebsiella pneumoniae* [(ATCC #4352)], *Escherichia coli* O157:H7 [(ATCC #35150)], and *Listeria monocytogenes* [(ATCC #19117)]

Kills *Listeria* [in 60 seconds]

Leaves no harsh chemical residue

Multi-purpose sanitizer

No animal ingredients

No mixing or measuring required

Noncorrosive formulation

No-Rinse Sanitizer

No rinsing required

Only for commercial uses

[*Product name*] is a convenient method for sanitizing thermometers and other small wares

[*Product name*] can be part of your facilities' [Hazard Analysis Critical Control Point] [HACCP] plan.

[*Product name*], food contact sanitizing spray formulated and designed to clean and sanitize [*insert food contact surfaces*].

Quick and easy sanitizing of [*add use surfaces from this label*]

Ready to use

Sanitizes as it cleans food prep surfaces**

Sanitizes [baby] [children's] [booster chairs] [high chairs] [high chair trays] [strollers]

Sanitizes [*choose one or more:*] [plastic] [and/or] [finished wood] [and/or] [nonwood] cutting boards

Sanitizes hard nonporous surfaces

Sanitizes interiors of [microwave ovens], [refrigerators], [stoves], [ranges], [freezers], [food trays], [lunch boxes], [dishwashers], [dish racks], [sinks]

Streak free cleaning

Test in an inconspicuous area prior to use

The [*Product name*] formula is noncorrosive. [Compatible with] [*or* May be used on] [*or* Will not damage]: [Stainless steel][and/or] [Small] [commercial kitchen wares]

The fast, easy and effective way to sanitize hard, nonporous [food contact] [and] [nonfood contact] surfaces

Use [as a part of] [in support of] your [FSMA-driven/compliant] HACCP plan

Use to sanitize during in-store food [demos] [*or* demonstrations]

Use in conjunction with food-service towel for the total cleaning and sanitizing solution

Use in conjunction with Sani Professional QuatCheck Kit to verify active level for your Health [Inspection authority] [*or* Inspector]

Use to sanitize the probe portion of [food] [and] meat] thermometers.

User friendly

Where compliance and guest experience meet

[***hard nonporous surfaces only*]

THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol "**" is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included

Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016

[The following graphics and statements are optional.
They may be placed anywhere on label/container.]

NOT FOR USE ON SKIN FOR USE ON HARD NONPOROUS SURFACES ONLY



THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol “**” is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included

Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016



THERMO-SAN™



HDPE

THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol “*” is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included

Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016

[The following are company logos for use on PDI product labels. The purpose of the logo is for easy recognition of PDI products in the marketplace.]



[Graphics depicting use sites listed on this label can appear on product label and labeling including:]

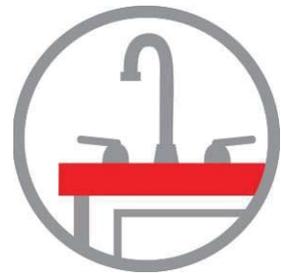
Dining Tables



Food Preparation Tables



Counter Tops



Non-wood Cutting Boards



Probe Portion of Meat Thermometer



THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol "**" is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included

Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

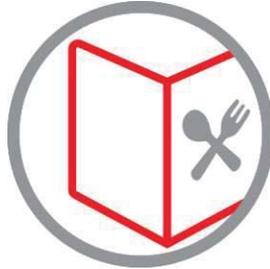
Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016

Thermometers,
Steam Wands



Laminated Menus



Counters



Cafeteria Trays,
Hospital Meal Trays
Airline Tray Tables
Pill Trays



Bar Tops



Waitress Stations



Food Carts



Microwaves, Ranges



Refrigeration, Freezer Units



Self-Service Condiment
Areas, Condiment Containers



THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol “**” is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included

Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016

Deli Slicer



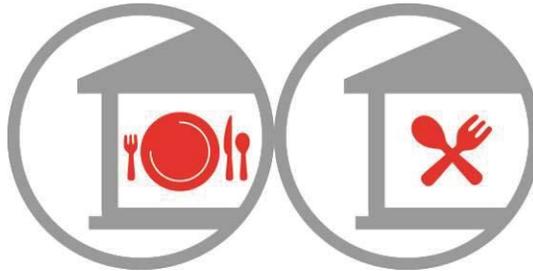
Conveyor Belts,
Conveyor Lines,
Hopper Trays,
Holding Containers



Small Wares
(beverage dispensers,
food mixers, scales)



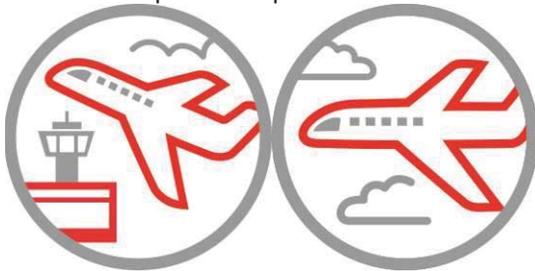
Restaurants



Dining Halls/Cafeterias



Airplanes/Airports



Caterers



Daycare Settings



THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol “**” is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included

Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016

Hotels/Motels



Cruise Ships



Nurseries



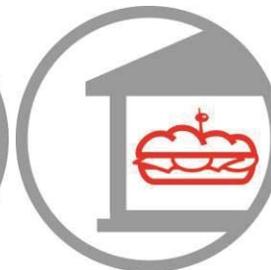
Nursing Homes



Schools



Delicatessens



Food Trucks



Food Manufacturing Facilities



Casinos



Grocery



THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol “**” is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included

Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016

Convenience Stores



Fitness



Kills Listeria in 60 seconds



Kills Listeria in 1 minute



[Logo]



THE INFORMATION IN BOX IS NOT PART OF THE LABELING

* - Precedes required label elements, (the symbol "**" is not required to appear on production labels)

[] - Statements in brackets are optional or instructional. Italicized words in brackets are not included

Sequence and placement of phrases is optional unless specified in 40 CFR 156.10.

Capitalization, plurals or singular, bold and italics are all variable unless specified in 40 CFR

January 21, 2016